

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MARCO CONTRACTORS, INC.)	
)	
Plaintiff,)	No. 2:20-cv-237
)	
vs.)	Judge J. Nicholas Ranjan
)	
CITIZENS FINANCIAL GROUP, INC.,)	
d/b/a CITIZENS BANK,)	
)	
Defendant.)	

PARTIES' JOINT STATUS REPORT REGARDING DISCOVERY

AND NOW COME, Plaintiff, Marco Contractors, Inc. (“Plaintiff” or “Marco”), and Defendant, Citizens Financial Group, Inc. (“Defendant” or “Citizens”), by and through their undersigned counsel and, pursuant to this Court’s December 21, 2021 Amended Case Management Order (Dkt. No. 85) and December 22, 2021 Order (Dkt. No. 86), file the within Joint Status Report:

1) Discovery completed to date:

Pursuant to the directives of Paragraph 1 of the December 21, 2021 Amended Case Management Order, both Marco and Citizens served discovery requests upon the other side on or before February 1, 2022—Citizens issued a deficiency letter on December 28, 2021 and Marco issued Amended Interrogatories and Requests for Production on February 1, 2022. Citizens timely served Objections and Responses to Marco’s Amended Interrogatories and Requests for Production on March 3, 2022 and subsequently produced supplemental documents on March 8, 2022. On April 25, 2022, Marco responded to Citizens’ deficiency letter with a responsive letter and supplemental document production. On April 26, 2022, Marco served Citizens with a deficiency letter regarding its March 3, 2022 Objections and Responses and March 8, 2022 supplemental production. Citizens is preparing a

response to Marco's April 26, 2022 letter and will be sending a letter to Marco regarding remaining deficiencies in Marco's discovery responses and document production.

Pursuant to the direction of the Court-appointed Special Master, Joseph Valenti, the Parties presently are focused on exchanging certain limited discovery that will allow the parties to engage in an in-person mediation.

2) Discovery that remains:

As of the date of this Joint Status Report, the parties have not noticed or conducted depositions relative to fact discovery. The parties have not yet begun expert discovery.

3) Existence of any discovery disputes:

As of the date of this Joint Status Report, Marco is waiting for a response to its April 26, 2022 deficiency letter. Citizens will be responding to the April 26 letter and also will be sending Marco a letter regarding continuing deficiencies in Marco's written discovery responses and document production. The Parties agree to meet and confer regarding any disputes, should any arise, before seeking Court intervention.

Respectfully submitted,

Date: May 6, 2022

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*Counsel for Defendant, Citizens Financial Group,
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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2022, the foregoing document was served electronically via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

Date: May 6, 2022

/s/ Christopher A. Cafardi

Christopher A. Cafardi

Pa. I.D. No. 90904